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Plaintiffs' Co-Lead Counsel

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Case No. 18-md-02843-VC

**DECLARATION OF LESLEY E. WEAVER
IN SUPPORT OF PLAINTIFFS' MOTION
FOR LEAVE TO FILE SECOND
AMENDED CONSOLIDATED
COMPLAINT**

I, Lesley E. Weaver, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am the Partner-in-Charge of the California Office of Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 18-md-02843-VC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them. This declaration is made in support of Plaintiffs’ Motion for Leave to File Second Amended Consolidated Complaint.

3. On February 20, 2020, Plaintiffs informed Facebook by letter that Plaintiff Bridget Peters would be unable to continue as a named plaintiff, and provided a draft stipulation reflecting the parties’ stipulation to Ms. Peters’s withdrawal and to amendment for the purpose of substituting plaintiffs Naomi Butler and Peter Christley.

4. On March 5, 2020, Facebook informed Plaintiffs by email that it would oppose Plaintiffs’ motion.

5. On March 20, 2020, Plaintiffs informed Facebook by letter that Plaintiff Olivia Johnston would be unable to continue as a Named Plaintiff, and that Plaintiffs intend to substitute additional named plaintiffs, seeking Facebook’s consent to Ms. Johnston’s withdrawal and to the substitution of additional plaintiffs.

6. On April 5, 2020, Facebook informed Plaintiffs by letter that it continued to oppose Plaintiffs’ motion to substitute plaintiffs Naomi Butler and Peter Christley, but would not oppose Plaintiffs’ motion to substitute additional U.S. plaintiffs.

7. On April 14, 2020, Plaintiffs informed Facebook by email that Plaintiff Ian Miller is unable to continue as a Named Plaintiff.

8. Attached as Exhibit 1 is a draft of the proposed Second Amended Consolidated Complaint.

9. Attached as Exhibit 2 is a comparison in redline form of the current operative complaint, the First Amended Consolidated Complaint (ECF No. 257), with the proposed Second Amended Consolidated Complaint.

10. I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and to the best of my knowledge. This declaration was executed in Oakland, California.

DATED: April 14, 2020

/s/ Lesley E. Weaver

Lesley E. Weaver